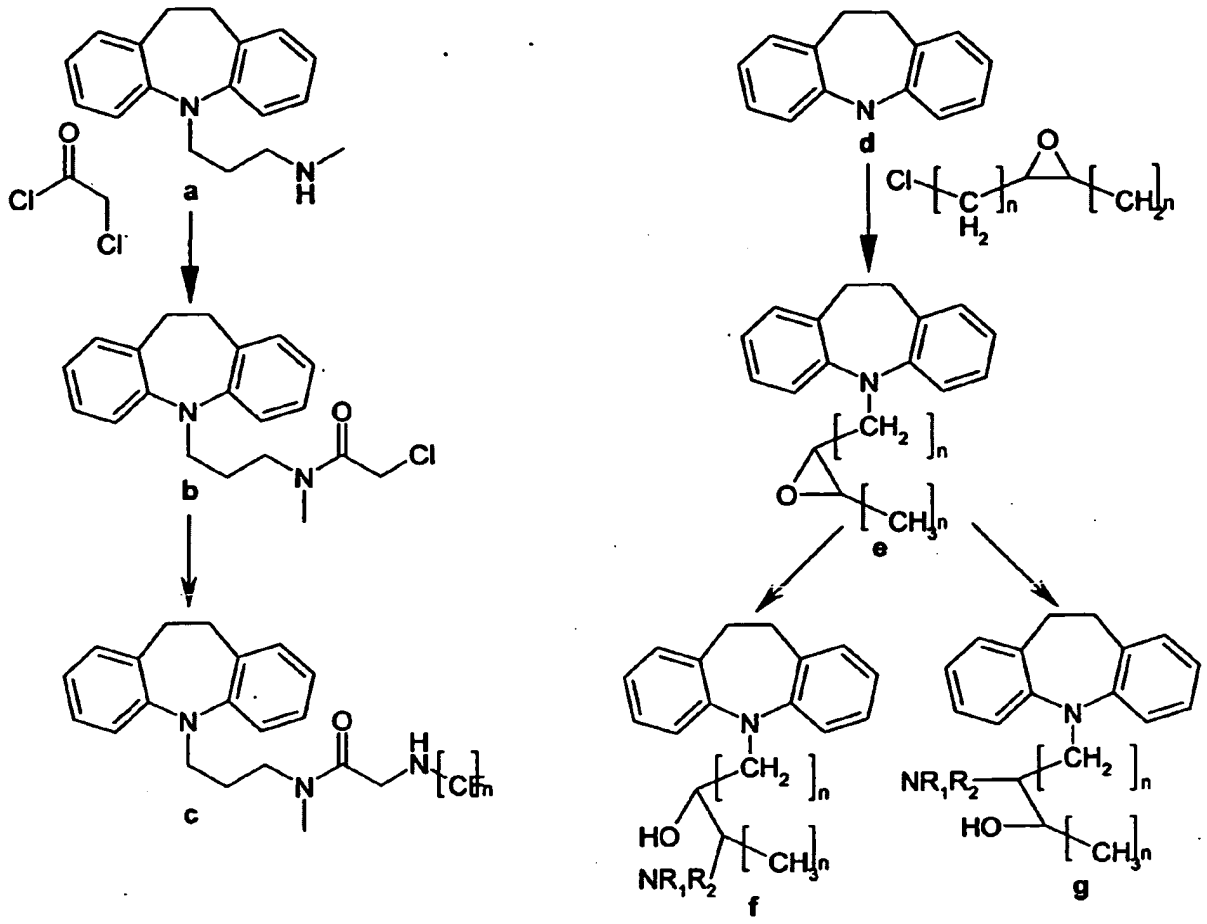
Claims were amended by strictly relying upon the specification of the riginally disclosed invention. Words, phrases, and terms used for amending the indicated claims are directly and literally obtained and supported from the specification of the originally disclosed invention, and are not obtained or supported from hints, suggestions, and/or creative deductions, drawn from the specification of the originally disclosed invention. Where necessary and indicated, claims have been renumbered, along with appropriate renumbering of each claim dependency.

In the Written Opinion, the Examiner cited and explained that original claims 1 and 2 lack novelty under PCT Article 33(2) as being anticipated by, and, lack inventive step under PCT Article 33(3) as being obvious over, Wang et al. (U.S. Patent No. 5,066,426).

By this Response, the Applicants have amended original claims 1 and 2, indicated as claims 1 and 2 in the replacement set of claims. In claims 1 and 2, recitation of the compound having the general formula (II) wherein R_1 is a "saturated alkyl" or a " $C(=O)(CH_2)_nNR'R''$ " substituent has been removed, in order not to coincide with the teachings of Wang et al.. Moreover, in claim 2, recitation of a compound wherein R_1 is a " $C(=O)(CH_2)_nNR'R''$ " substituent has been replaced by recitation of the compound wherein R_1 is a " $(CH_2)_nCHOHCH_2NR'R''$ " substituent, said substituent being a particular type of the amino-alcohol substituent recited in claim 1. The Applicants contend that the compounds recited in amended claims 1 and 2 are not explicitly or suggestively taught by Wang et al., and, therefore represent novelty over Wang et al..

Moreover, with respect to inventive step, the following remarks clearly show that the compounds of the present invention recited by amended claims 1 and 2 are not obviously derived by one of ordinary skill in the art from the teachings of Wang et al..

The Examiner's attention is respectfully directed to the following schematic diagram comparing the synthetic pathway disclosed by the present invention (right side) to that disclosed by Wang et al. (left side). Dibenzoazepine (d) is the skeleton of several well known and taught about TCADs (tricyclic-antidepressants), such as imipramine. There are many different synthetic techniques and pathways one could use to introduce different functional groups into the dibenzoazepine skeleton (d). In particular, one can use well known alkylation to obtain the N-alkylated derivative, such as imipramine.



(Wang et al) (Present Invention)

In the Wang et al. invention, the general reaction is acetylation of commercially available amine. In particular, the acetylation reaction using a chloroacetylchloride leads to the amide group (b), above. Carboxyfluorescein fluorescence reagent is introduced into a particular compound by amination, using an appropriate amine reagent for obtaining the corresponding amino-amide (c), above. In Example VIII of Wang et al., there is disclosed preparation of the amino-amide derivative (c) from the commercially available imipramine derivative, desipramine (a).

By strong contrast, however, in the present invention, the Applicants have 'inventively' introduced the use of an epoxide, for obtaining an epoxide substituted dibenzoazepine (e), above, which in turn is used as the precursor of novel beta or alpha-aminoalchol derivatives of dibenzoazepine, illustrated by (f) and (g), respectively, above, and recited in amended claims 1 and 2. Further support for amendment of claims 1 and 2 is clearly found in the originally filed application, in Example 3, wherein the Applicants describe in detail the synthetic

pathway and procedure for obtaining the racemic mixture and the pure enantiomers of the beta-isoproyl amine derivative f dibenzoazepine.

Thus, the Applicants contend that the compounds recited in amended claims 1 and 2 are not explicitly or suggestively taught by, and are not obviously derived from, the disclosure of Wang et al., and, therefore represent novelty and inventive step with respect to the prior art, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

In the Written Opinion, the Examiner cited and explained that original independent claim 6, and, claims 7 and 11, depending therefrom, lack novelty under PCT Article 33(2) as being anticipated by, and, lack inventive step under PCT Article 33(3) as being obvious over, Wang et al. (U.S. Patent No. 5,066,426). Additionally, the Examiner cited and explained that original independent claim 6 lacks novelty under PCT Article 33(2) as being anticipated by, and, lacks inventive step under PCT Article 33(3) as being obvious over, Arzneimittelwerk Dresden GMBH (EP Patent Application No. 515, 796 A1), Ruger et al. (U.S. Patent No. 5,264,432), and, Mihm et al. (U.S. Patent No. 5,002,943).

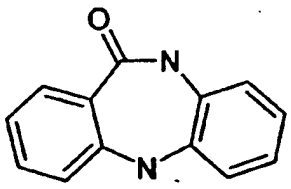
By this Response, the Applicants have amended original claim 6, indicated as claim 6 in the replacement set of claims. In the preamble of original claim 6, the phrase "A composition for treating or preventing a cardiac disorder" has been amended to the phrase "A composition for treating or preventing cardiac arrhythmia", now appearing in the preamble of claim 6 in the replacement set of claims, in order to properly and better claim the originally disclosed invention, and in order to clearly distinguish and limit the novelty and inventive step of the composition of the present invention from that disclosed in the particular prior art references cited by the Examiner.

The Applicants respectfully point out to the Examiner that recitation of amended claim 6 is not only of 'a **compound**', rather, of "A **composition** for treating or preventing cardiac arrhythmia, comprising a pharmaceutically effective amount of a **compound in combination with** a pharmaceutically acceptable carrier . . . ". Wang et al. teaches of "a method and reagents for determining ligands in biological fluids such as serum, plasma, spinal fluid, amnionic fluid and urine. In particular, this disclosure relates to a fluorescence polarization immunoassay procedure and to a novel class of tracer compounds employed as reagents in such procedures." Additionally, in Wang et al., in column 3, lines 3 - 22, it is stated "Representative of ligands having a single reactive amino group determinable by the methods of the present invention include steroids . . . , vitamins . . . , antiasthmatic drugs . . . , antiarrhythmic drugs . . . , anticonvulsant drugs . . . , antibiotics . . . , antiarithritic drugs . . . ,

antidepressant drugs . . . , . . . as well as the metabolites thereof." The Applicants strongly assert that (1) the **composition** recited by amended claim 6 of the present invention is not explicitly or suggestively taught by Wang et al., and, (2) that it is not obvious to one of ordinary skill in the art of pharmacology and/or medicinal chemistry to search for, and eventually, to modify, any of the "tracer compounds" of Examples VIII, XXIII, or, XXIV, disclosed by Wang et al., for 'combining' "a pharmaceutically effective amount of" any such modified compound "with a pharmaceutically acceptable carrier" for deriving "A composition for treating or preventing cardiac arrhythmia," recited according to amended claim 6 of the present invention. Accordingly, the Applicants strongly assert that the "composition" recited by amended claim 6 represents both novelty and inventive step over the 'compounds' disclosed in Wang et al..

Additionally, in original claim 6, recitation of the composition including a compound being a member of a group having the formula (I) wherein A is a "C=O" substituent, and, wherein R_1 is a "saturated alkyl" substituent have been removed, as indicated by amended claim 6 in the replacement set of claims, in order not to coincide with the teachings of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al.. The Applicants contend that the composition recited in amended claim 6 is not explicitly or suggestively taught by these cited prior art references, and, therefore represents novelty over the cited prior art.

Moreover, with respect to inventive step, the following remarks clearly show that the compound included in the composition of the present invention recited by amended claim 6 is not obviously derived by one of ordinary skill in the arts of pharmacology and/or medicinal chemistry from the teachings of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination.



(A)

Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., each discloses use of the general dibenzodiazepine skelton (A), illustrated above. The Applicants strongly contend that changing the amide bridge in (A) to the A-B bridge as disclosed in the present invention is not trival and therefore, not obvious to one of ordinary skill in the art. A different synthetic pathway and procedure must be applied in order to obtain the different seven

member heterocyclic ring. Moreover, the synthesis of either or both of the two substituted benzyl rings also impacts the overall synthesis, for example, the synthesis of imipramine is a condensation of 2-chloromethylphenylamine in the presence of a base, by way of a Lapworth reaction, whereas, by contrast, the synthesis of the monosubstituted benzyl ring system follows from a Wittig reaction of the same substrate (2-chloromethylphenylamine), but, using an appropriate benzaldehyde reagent.

Thus, the Applicants contend that the composition recited in amended claim 6 is not explicitly or suggestively taught by, and is not obviously derived from, the disclosures of Wang et al., Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination, and, therefore represent novelty and inventive step with respect to the prior art, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

In view of the preceding discussion regarding establishing novelty and inventive step for amended independent claim 6, the Applicants submit that claims 7 and 11, indicated as claims 7 and 11 in the replacement set of claims, depending therefrom, represent novelty and inventive step with respect to the prior art, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

In the Written Opinion, the Examiner cited and explained that original independent claim 14, and dependent claims 16 and 21, therefrom, lack novelty under PCT Article 33(2) as being anticipated by, and, lack inventive step under PCT Article 33(3) as being obvious over, Arzneimittelwerk Dresden GMBH (EP Patent Application No. 515, 796 A1), Ruger et al. (U.S. Patent No. 5,264,432), and, Mihm et al. (U.S. Patent No. 5,002,943).

By this Response, the Applicants have amended original claim 14, indicated as claim 14 in the replacement set of claims. In the preamble of original claim 14, the phrase "A method for treating or preventing a cardiac disorder" has been amended to the phrase "A method for treating or preventing cardiac arrhythmia", now appearing in the preamble of claim 14 in the replacement set of claims, in order to properly and better claim the originally disclosed invention, and in order to clearly distinguish and limit the novelty and inventive step of the method of the present invention from that disclosed in the particular prior art references cited by the Examiner.

Additionally, in original claim 14, recitation of the method including a compound being a member of a group having the formula (I) wherein A is a "C=O" substituent, and, wherein R_1 is a "saturated alkyl" substituent have been removed, as indicated by amended claim 14 in the replacement set of claims, in order not to coincide with the teachings of

Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al.. The Applicants contend that the composition recited in amended claim 14 is not explicitly or suggestively taught by these cited prior art references, and, theref re represents novelty over the cited prior art.

Moreover, with respect to inventive step, the preceding remarks above used for establishing inventive step of the composition of the present invention, as recited by amended claim 6, are similarly applicable for establishing inventive step of the method recited by amended claim 14, whereby the compound included in the method of the present invention recited by amended claim 14 is not obviously derived by one of ordinary skill in the art pharmacology and/or medicinal chemistry from the teachings of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination.

Thus, the Applicants contend that the method recited in amended claim 14 is not explicitly or suggestively taught by, and is not obviously derived from, the disclosures of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination, and, therefore represent novelty and inventive step with respect to the prior art, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

In view of the preceding discussion regarding establishing novelty and inventive step for amended independent claim 14, the Applicants submit that claim 16, indicated as claim 16 in the replacement set of claims, depending therefrom, represents novelty and inventive step with respect to the prior art, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

By this Response, the Applicants have cancelled original dependent claim 21. Accordingly, original dependent claims 22 and 23 have been renumbered as dependent claims 21 and 22, respectively, in the replacement set of claims.

In the Written Opinion, the Examiner cited and explained that original independent claim 24, and dependent claim 31, therefrom, lack novelty under PCT Article 33(2) as being anticipated by, and, lack inventive step under PCT Article 33(3) as being obvious over, Arzneimittelwerk Dresden GMBH (EP Patent Application No. 515, 796 A1), Ruger et al. (U.S. Patent No. 5,264,432), and, Mihm et al. (U.S. Patent No. 5,002,943).

By this Response, the Applicants have amended original claim 24, indicated as claim 23 in the replacement set of claims.

In the preamble of original claim 24, the phrase "A method for stopping the occurrence of ventricular fibrillation in a subject" has been amended to the phrase "A method for transforming sustained ventricular fibrillation to spontaneously defibrillating transient

ventricular fibrillation in a subject", now appearing in the preamble of claim 23 in the replacement set of claims, in order to properly and better claim the originally disclosed invention, and in rder to clearly distinguish and limit the novelty and inventive step of the method of the present invention from that disclosed in the particular prior art references cited by the Examiner.

Support for amendment of original claim 24, indicated by claim 23 in the replacement set of claims, is clearly found in several places, including in Example 4, in the specification as originally filed, wherein there is detailed description of this aspect of the present invention, relating to and focusing on "**transforming** sustained ventricular fibrillation to spontaneously defibrillating transient ventricular fibrillation".

Specifically, in the specification as originally filed, on p. 3, lines 10 - 13, therein is stated "It is shown herein for the first time that these new tricyclic compounds and some previously known tricyclic compounds have been synthesized and have been shown to have substantial activity as chemical **defibrillating** agents."

Additionally, in the specification, on p. 4, lines 22 - 29, therein is stated "The present invention relates to a group of compounds, based upon the general backbone structure of tricyclic antidepressants, namely, 11-oxo-dibenzodiazepins and dibenzoazepins N-substituted at the 5 position, as well as to pharmaceutical compositions of these compounds and to their use in the treatment and prevention of ventricular fibrillation and ischemic damage by local or systemic application. More specifically, these compounds are demonstrated to have a **defibrillating effect** on ventricular fibrillation, once it actually occurs.

Additionally, in the specification, on p. 5, lines 16 - 25, therein is stated "The development of the disclosed class of tricyclic compounds was based on the rationalized design of new compounds, aimed at more focused and selective **activity as chemical defibrillators**, as well as identifying additional molecules which are able to overcome shortcomings of the presently utilized approaches (electrical defibrillation, antiarrhythmic drugs, described above), and which are able to **convert** the fatal sustained ventricular fibrillation to the non-fatal transient one.

The experiments described below in the Examples section demonstrate that the disclosed compounds are indeed effective in **transforming** the potentially fatal VF type, SVF, to the spontaneously-defibrillating type, TVF."

Additionally, in the specification, on p. 25 - 26, Example 4 provides a detailed example of "Antiarrhythmic defibrillating activity of tricyclic dibenzoazepin and 11-Oxo-dibenzodiazepin compounds", wherein it is stated, in lines 12 - 15 "The desired

outcome was determined to be the ability of the drug molecule to reduce or abolish the occurrence of artificially induced SVF, and its transf rmation t the spontaneously defibrillating TVF."

The following remarks clearly show that the "method for transforming sustained ventricular fibrillation to spontaneously defibrillating transient ventricular fibrillation in a subject", as described in the specification and recited by claim 23, in the replacement set of claims, represents both novelty and inventive step over the "antiarrhythmia" and/or "antifibrillatory effect" teachings of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination.

The inventions of Arzneimittelwerk Dresden GMBH and Ruger et al., as stated by Ruger et al., in column 1, lines 9 - 26, ". . . relates to new 'compounds of formula (I)' . . . and to their pharmaceutical use particularly for the treatment of arrhythmia and cholinergic disorders." Furthermore, as stated by Ruger et al., in column 1, lines 48 - 68, their invention clearly relates to "antiarrhythmic drugs of class I" in order to "find drugs, which have as balanced a ratio of antiarrhythmic to anticholinergic effect as possible and are thus suitable for the treatment of bradyarrhythmias (arrhythmias with a low pulse rate)."

Respectfully referring the Examiner to the "List Of References Cited" on p. 30 - 31 of the originally filed application, it is well established and known in the fields of pharmacology and medicinal chemistry that "antiarrhythmic drugs of class (category) I" exclusively relates to 'preventing or suppressing the onset or initiation of ventricular fibrillation', for example, 'by elevating the threshold to initiation of ventricular fibrillation', and **clearly does not** relate to "transforming sustained ventricular fibrillation to spontaneously defibrillating transient ventricular fibrillation", as described and exemplified in detail in the specification of the present invention as originally filed, and, recited in claim 23 of the replacement set of claims.

In describing the protocol and disclosing results of animal trials relating to "testing the antiarrhythmic effectiveness" of their compounds and compositions, in Arzneimittelwerk Dresden GMBH, p. 5, line 29 to p. 7, corresponding to Ruger et al., in column 6, line 32 to column 8, line 10, the stated "antiarrhythmic effect", also, referred by them as an "antifibrillatory effect", clearly relates to 'preventing or suppressing the onset or initiation of ventricular fibrillation', and **clearly does not** relate to "transforming sustained ventricular fibrillation to spontaneously defibrillating transient ventricular fibrillation", as recited in claim 23 of the replacement set of claims f the present invention. More specifically, with reference to Arzneimittelwerk Dresden GMBH, p. 7, lines 5 - 6, corresponding to Ruger et al., in column 7, lines 59 - 60, the statement ". . . the dose in mg/kg, which suppresses the fibrillatory

effect of . . ." relates to 'preventing or suppressing the onset or initiation of ventricular fibrillations', and **does not** relate to "**transf rming** sustained ventricular fibrillation to spontaneously defibrillating transient ventricular fibrillation", as described and exemplified in detail in the specification of the present invention as originally filed, recited in claim 23 of the replacement set of claims of the present invention.

The disclosure of Mihm et al. relates exclusively to compounds and compositions containing the disclosed compounds for treating "bradycardia and bradyarrhythmia", for example, as described in column 6, lines 53 - 63, therein. Throughout the entire disclosure of Mihm et al., there is no explicit or suggestive description or teaching of ventricular fibrillation, in general, and, treatment or prevention of ventricular fibrillations, in particular.

Thus, the Applicants, including two of the inventors who are internationally established and known experts in the fields of pharmacology and medicinal chemistry relating to the subjects of antiarrhythmia and antifibrillatory phenomena, strongly contend that the "method for transforming sustained ventricular fibrillation to spontaneously defibrillating transient ventricular fibrillation in a subject", as described in the specification and recited by claim 23, in the replacement set of claims, represents both novelty and inventive step over the "antiarrhythmia" and/or "antifibrillatory effect" teachings of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

In view of the preceding discussion regarding establishing novelty and inventive step for amended independent claim 24, indicated as claim 23 in the replacement set of claims, the Applicants submit that original claim 31, indicated as claim 30 in the replacement set of claims, depending therefrom, represents novelty and inventive step with respect to the prior art, and such is respectfully requested to be indicated in the International Preliminary Examination Report. The Examiner is respectfully reminded that original claims 25 - 32, depending from original claim 24, have been renumbered as claims 24 - 31, depending from claim 23, along with appropriate renumbering of each claim dependency, in the replacement set of claims.

In the Written Opinion, the Examiner cited and explained that original independent claim 33, and dependent claims 34 - 37, therefrom, lack novelty under PCT Article 33(2) as being anticipated by, and, lack inventive step under PCT Article 33(3) as being obvious over, Arzneimittelwerk Dresden GMBH (EP Patent Application No. 515, 796 A1), Ruger et al. (U.S. Patent No. 5,264,432), and, Mihm et al. (U.S. Patent No. 5,002,943).

By this Response, the Applicants have amended riginal claim 33, indicated as claim 32 in the replacement set of claims.

Original claim 33 has been amended to recite "A method of locally treating or preventing cardiac ischemia in a subject comprising the step of locally applying onto a cardiac tissue a composition comprising a pharmaceutically effective amount of a compound in combination with a pharmaceutically acceptable carrier, said compound being a member of a group having the formula:", as recited by claim 32, in the replacement set of claims.

Support for amendment of original claim 33, indicated by claim 32 in the replacement set of claims, is clearly found in several places, including in Examples 4, 5, and, 6, in the specification as originally filed, wherein there is description of this aspect of the present invention, relating to "locally treating or preventing cardiac ischemia in a subject ".

Specifically, for example, in the specification, on p. 4, lines 22 - 27, therein is stated "The present invention relates to a group of compounds, based upon the general backbone structure of tricyclic antidepressants, namely, 11-oxo-dibenzodiazepins and dibenzoazepins N-substituted at the 5 position, as well as to pharmaceutical compositions of these compounds and to their use in the treatment and prevention of ventricular fibrillation and ischemic damage by local or systemic application.

Throughout the entire disclosures of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., there is no explicit or suggestive description or teaching of cardiac ischemia, in general, and, treatment or prevention of cardiac ischemia, in particular, and such is not obviously derived from the disclosures of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination.

Thus, the Applicants assert that the "method of locally treating or preventing cardiac ischemia in a subject", as described in the specification and recited by claim 32, in the replacement set of claims, represents both novelty and inventive step over the "antiarrhythmia" and/or "antifibrillatory effect" teachings of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

In view of the preceding discussion regarding establishing novelty and inventive step for amended independent claim 33, indicated as claim 32 in the replacement set of claims, the Applicants submit that original claim 34, indicated as claim 33 in the replacement set of claims, depending therefrom, represents novelty and inventive step with respect to the prior art, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

By this Response, the Applicants have cancelled original dependent claims 35 - 37.

In the Written Opinion, the Examiner cited and explained that original independent claim 38, and dependent claim 45, therefrom, lack novelty under PCT Article 33(2) as being anticipated by, and, lack inventive step under PCT Article 33(3) as being bvious over, Arzneimittelwerk Dresden GMBH (EP Patent Application No. 515, 796 A1), Ruger et al. (U.S. Patent No. 5,264,432), and, Mihm et al. (U.S. Patent No. 5,002,943).

By this Response, the Applicants have amended original claim 38, indicated as claim 34 in the replacement set of claims.

In the preamble of original claim 38, the phrase "A method for treating or preventing a cardiac disorder in a subject" has been amended to the phrase "A method for transforming sustained ventricular fibrillation to spontaneously defibrillating transient ventricular fibrillation in a subject", now appearing in the preamble of claim 34 in the replacement set of claims, in order to properly and better claim the originally disclosed invention, and in order to clearly distinguish and limit the novelty and inventive step of the method of the present invention from that disclosed in the particular prior art references cited by the Examiner.

The remarks above used for amending, and, for establishing novelty and inventive step of the method of the present invention, as recited by amended claim 24, indicated as claim 23 in the replacement set of claims, are equally applicable for amending, and, for establishing novelty and inventive step of the method recited by amended claim 38, indicated as claim 34 in the replacement set of claims. Further support for establishing novelty and inventive step of claim 34 is clearly found in the specification as originally filed, on p. 10, line 26, to p. 11, line 30, with respect to "the step of inducing cardiac sympathetic activity", as recited in claim 34.

Thus, the Applicants strongly contend that the "method for transforming sustained ventricular fibrillation to spontaneously defibrillating transient ventricular fibrillation in a subject", as described in the specification and recited by claim 34, in the replacement set of claims, represents both novelty and inventive step over the "antiarrhythmia" and/or "antifibrillatory effect" teachings of Arzneimittelwerk Dresden GMBH, Ruger et al., and, Mihm et al., either singly or in combination, and such is respectfully requested to be indicated in the International Preliminary Examination Report.

By this Response, the Applicants have cancelled original dependent claim 45. The Examiner is respectfully reminded that original claims 39 - 44, depending from original claim 38, have been renumbered as claims 35 - 40, depending from claim 34, along with appropriate renumbering of each claim dependency, in the replacement set of claims.

In the Written Opinion, the Examiner cited and explained that original claims 3 - 5, 8 - 10, 12 - 13, 15, 17 - 20, 22, 23, 25 - 30, 32, and, 39 - 44, indicated by claims 3 - 5, 8 - 10, 12 - 13, 15, 17 - 20, 21, 22, 23 - 29, 31, and, 35 - 40, respectively, in the replacement set of claims, meet the criteria set out in PCT Article 33(2)-(3), because the prior art does not teach or fairly suggest the compounds, compositions, and method of use of the compounds as claimed herein. The Examiner also cited and explained that original claims 1 - 45, indicated by claims 1 - 40, respectively, in the replacement set of claims, meet the criteria set out in PCT Article 33(4), for industrial applicability. The Examiner made no new citations since the mailing of the International Search Report, Mar. 30, 2001.

By this Response, including the above amendments and remarks, the Applicant respectfully requests that replacement set of claims 1 - 40 be used for establishing the International Preliminary Examination Report, and such action is respectfully requested.

Respectfully submitted,

Gal Ehrlich as Agent for Applicant

Date: November 19, 2001